## REMARKS

Applicant respectfully requests consideration and allowance of the elected claims.

Claim 85 is amended to remove an unintended comma.

Claim 86 is canceled without prejudice.

Claims 53-85 and 87-88 remain pending.

### Specification

The disclosure is objected to for informalities involving missing serial numbers of referenced cases. The first two instances cited by the Office regarding pages 1 and 12 were corrected in the Response to Restriction Requirement filed July 23, 2004. The third instance on page 30 is cured in this Response. Applicant thanks the Examiner for noting this third instance.

Accordingly, the objection can now be removed.

### Cited Reference Not On Form PTO-892

The Office cited U.S. Patent No. 6,356,866 to Pratley et al. It is noted that this reference was not listed on the Form PTO-892 and no copy was received. The undersigned attorney was able to obtain a copy of the reference, but Applicant respectfully requests that the reference be formally included in the record.

### 35 U.S.C. § 102

Claims 53-54, 56-63, 65-70, 72-75, 77-80, 82-85, and 87-88 stand rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 5,214,583 to Miike et al. (hereinafter, "Miike"). Applicant respectfully traverses the rejection.

**Claim 53** defines a language input user interface comprising:

a line-based entry area;

an input text displayed within the line-based entry area; and

an output text, converted from the input text, displayed together with unconverted input text within the line-based entry area.

The specification describes one exemplary implementation in Figs. 2 and 3, where both converted text ($C_1$, $C_2$, etc.) and unconverted text ($P_1$, $P_2$, $P_3$, etc.) are displayed together within the line-based entry area 202. This advantageously allows the user to focus attention on a single area of the screen, rather than two different areas. In this example, as the user enters phonetic text, the phonetic text P is presented in-line in a first direction (e.g., horizontal across the screen) and the input cursor 204 is positioned by or in alignment with the converted language text $C_1C_2$ and the input phonetic text $P_1P_2P_3$.
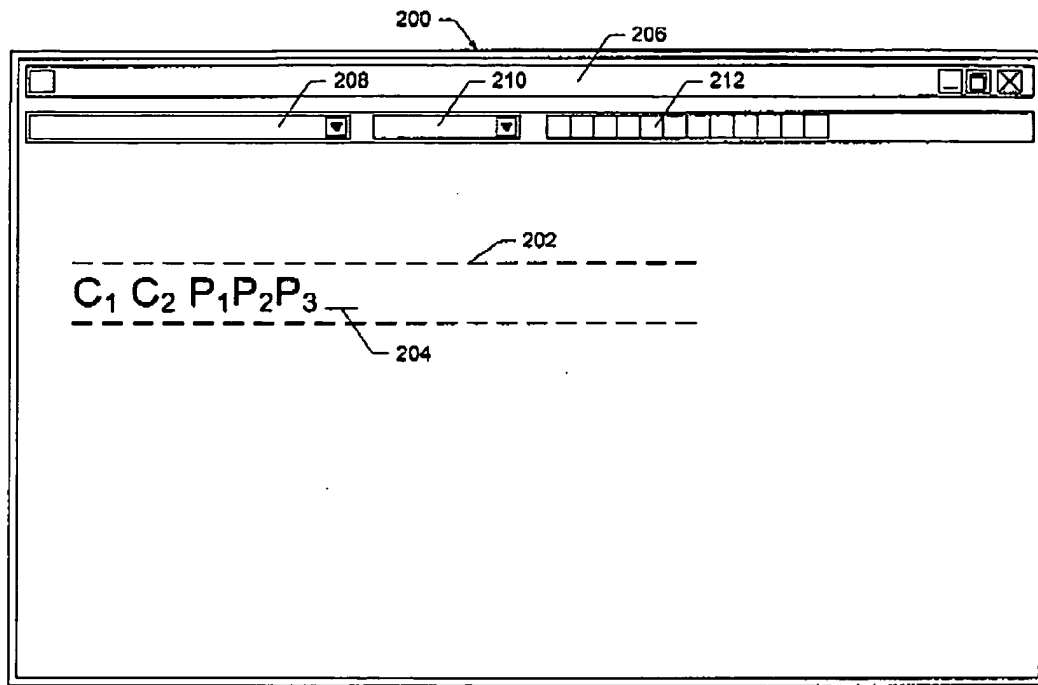
Fig. 2

As the user continues to enter phonetic text P, the user interface automatically converts the phonetic text P in real time to language text C without the user having to switch modes. As shown in the example of Fig. 3, as soon as the user enters the next phonetic text $P_4$, the previous phonetic text $P_1P_2P_3$ is automatically converted to language text $C_3$. The user continues inputting phonetic text $P_4P_5P_6P_7$ without having to switch modes or hesitating.
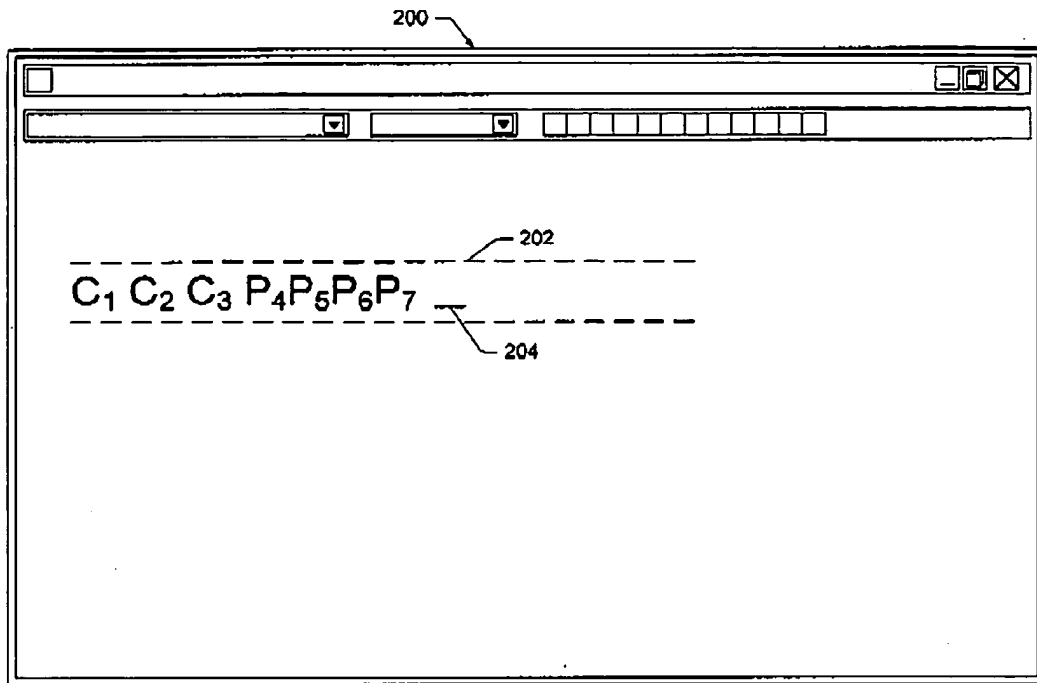
18

$$C_1 \; C_2 \; C_3 \; P_4 P_5 P_6 P_7$$

Fig. 3

Miike does not disclose this interface. Miike describes a machine language translation system which produces consistent translated words. In Fig. 3, Miike shows a screen layout in which original text is displayed on the left side of the screen and translated text is displayed separately on the right side of the screen. (*Miike*, col. 3, lines 50-58).

Miike does not disclose "a line-based entry area" with "an input text displayed within the line-based entry area" and "an output text, converted from the input text, displayed together with unconverted input text within the line-based entry area." Instead, Miike discloses two different screen regions, wherein the left-side screen region holds the original text and the right-side screen region holds the translated text. This requires the user to toggle his/her attention between the

two regions. In Miike, the original text and the translated text are never "displayed together ... within the line-based entry area" as recited in claim 53.

The Office argues that Miike shows "a line based entry area; an input text displayed with the line based entry area; and an output text ... area" as character key input, edit region, and translated region (Figs. 2 + 3)." (*Office Action*, page 3, first paragraph). Applicant disagrees with this position. First, consider each element in Miike that is identified by the Office. The first element—Miike's character key input of Fig. 2—is a keyboard (*Miike*, col. 3, lines 44-49); it has nothing to do with how to display input and output text. The second element— edit region—is described as a portion of the screen "for displaying information necessary for various edit operations". (*Miike*, col. 3, lines 56-58). This region does not hold the original text to be translated. The third element—the translated region—is the isolated area on the right side of the screen that shows the translated text. This region is entirely separate and distinct from the edit region (and from the original text region).

Assuming the Office's interpretation, as best understood by Applicant, Miike's keyboard corresponds to the claimed "line-based entry area", the edit region apparently corresponds to the claimed "input text", and Miike's translated region apparently corresponds to the claimed "output text". A quick examination of the claim language shows why the Office's interpretation is faulty and the analogy breaks down. Claim 1 states that the input text is "displayed within the line-based entry area". Under the Office's analogy, the information in the edit region (which the Office equates to the input text) would have to be displayed on the keyboard (which the Office equates to the line-based entry area). Plainly, the edit information is not displayed on the keyboard. Instead, the edit information is

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RESPONSE TO OFFICE ACTION DATED SEPTEMBER 2, 2004                                Serial No. 09/606,811

PAGE 23/27 * RCVD AT 12/21/2004 6:22:39 PM [Eastern Standard Time] * SVR:USPTO-EFXRF-1/3 * DNIS:8729306 * CSID:509 323 8979 * DURATION (mm-ss):06-24

displayed in a separate edit region on a display screen. Claim 1 further requires that the "output text" be "converted from the input text". Under the Office's interpretation, the translated text in the translated region (which the Office equates to the output text) would have to be converted from the information in the edit region, which again is not the case. Instead, the translated text is translated from the original text in original display region.

Finally, claim 1 requires that the output text be "displayed together with unconverted input text within the line-based entry area." Under the Office's application of Miike, the translated text would need to be displayed with the edit information on the keyboard. This is clearly not the case.

Accordingly, Miike fails to disclose, teach, or suggest the user interface of claim 53. Claim 53 is allowable over Miike and the §102 rejection thereto should be withdrawn.

**Dependent claims 54, 54, 56-63, 65-70, and 72-73** depend from claim 53 are allowable by virtue of this dependency.

**Claim 74** defines a language input architecture comprising:

a user interface to enable a user to enter an input text;

a language conversion unit to convert the input text to an output text; and

the user interface being configured to display the converted output text in-line with unconverted input text.

Similar to claim 53, claim 74 recites that the user interface is configured to "display the converted text in-line with unconverted input text." As noted above, Miike does not disclose this feature.

**Dependent claims 75, 77-80, and 82-85** depend from claim 74 are allowable by virtue of this dependency.

**Claim 87** recites, "display the language text and unconverted phonetic text in-line together within a line-based entry area". For the reasons given above with respect to claim 53, Miike does not teach this feature.

**Claim 88** recites, "display the language text, non-phonetic text, and unconverted phonetic text in-line together within a line-based entry area." As above, Miike does not disclose this feature.

**Claim 86** stand rejected under 35 U.S.C. § 102 as being anticipated by U.S. Patent No. 6,356,866 to Pratley et al. (hereinafter, "Pratley"). It is noted that the Pratley reference is assigned to Microsoft Corporation, the assignee of the subject application. To expedite prosecution, claim 86 is canceled without prejudice, and Applicant reserves the right to pursue this claim in a continuation application.

**35 U.S.C. § 103**

**Claims 55 and 76** are ejected under 35 U.S.C. § 103 as being unpatentable over Miike. Applicant respectfully traverses this rejection.

Claims 55 and 76 depend from claims 53 and 74, respectively, and thus include all features recited in these base claims. Claim 55 therefore requires "an output text, converted from the input text, displayed together with unconverted input text within the line-based entry area" as recited in claim 53. Claim 76

requires "the user interface being configured to display the converted output text in-line with unconverted input text" as recited in claim 74.

As noted above, Miike does not disclose, teach, or suggest this feature. Indeed, Miike teaches away from the claimed subject matter in that Miike specifically requires two separate and isolated display regions, one for original text and a second for translated text.

For these reasons, the § 103 rejection of claims 55 and 76 should be withdrawn.

**Claims 64, 71, and 81** stand rejected under 35 U.S.C. § 103 as being unpatentable over Miike in view of Pratley. Applicant respectfully traverses this rejection.

Pratley should also be removed as a reference in the context of this §103 rejection. The subject application was filed June 28, 2000. Pursuant to 35 U.S.C. §103(c), which was amended effective Nov. 29, 1999 (Public Law 106-113),

> Subject matter developed by another person, which qualifies as prior art only under one or more of sub-sections (e), (f), and (g) of section 102 of this title, shall not preclude patentability under this section where the subject matter and the claimed invention were, at the time the invention was made, owned by the same person or subject to an obligation of assignment to the same person.

Pratley is cited as prior art under 35 U.S.C. §102(e). Both the subject application and Pratley were owned by, or subject to an obligation of assignment to, the same person or organization at the time the invention of the subject application was made. Given that the filing date of the subject application is after

November 29, 1999, Applicant respectfully submits that Pratley is not a useable prior art reference under 35 U.S.C. §103(a) for the subject application.

Accordingly, these claims are in condition for allowance.

### Conclusion

All pending claims 53-85 and 87-88 are in condition for allowance. Applicant respectfully requests prompt allowance of the subject application. If any issue remains unresolved that would prevent allowance of this case, **the Examiner is requested to urgently contact the undersigned attorney to resolve the issue**.

Respectfully Submitted,

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By: _____

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